

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

COAST TO COAST TITLE, LLC; SOL	§	
CITY TITLE, LLC; MAGNOLIA TITLE	§	
ARKANSAS, LTD.; MAGNOLIA TITLE	§	
FLORIDA, LLC; THE PEABODY	§	
BULLDOG, LLC; AND JOHN MAGNESS	§	
 Plaintiffs	§	Civil Action No. 4:24-cv-02767
 v.	§	
TYRRELL L. GARTH; PHILLIP H.	§	
CLAYTON; DEBBIE MERRITT A/K/A	§	
DEBORAH MERRITT; MATTHEW D.	§	
HILL; CHARLES BURNS; P. GARRETT	§	
CLAYTON; SCOTT M. REEVES;	§	
ARIANE E. YOUNG; TINGLEMERRITT,	§	
LLP; STARREX TITLE FLORIDA, LLC;	§	
LAURIE COOPER; MARKETSTREET	§	
CAPITAL PARTNERS, LLC;	§	
MAKETSTREET CAPITAL PARTNERS	§	
AR, LLC; AND BRIAN A. BREWER	§	
 Defendants.	§	

**DEFENDANTS TYRRELL L. GARTH AND PHILLIP H. GLAYTON'S UNOPPOSED  
MOTION FOR WITHDRAWAL AND SUBSTITUTION COUNSEL**

Pursuant to Local Rule 83.2, Defendants Tyrrell L. Garth (“Garth”) and Phillip H. Clayton (“Clayton”) file this Unopposed Motion for Withdrawal and Substitution of Counsel as follows:

1. W. Jackson Wisdom and James M. Cleary, Jr. of Martin, Disiere, Jefferson & Wisdom, L.L.P. appeared as counsel of record for Defendants Garth and Clayton on July 25, 2024. Dkt. No. 1. A conflict has since been identified that precludes Mr. Wisdom and Mr. Cleary from continuing to serve in that capacity.

2. On September 18, 2024, Garth and Clayton retained Fields Alexander, Amy Parker Beeson, and Kaitie Sorenson of Beck Redden LLP to serve as substitute counsel of record in this matter.

3. Garth and Clayton are therefore respectfully requesting that Mr. Wisdom and Mr. Cleary of Martin, Disiere, Jefferson & Wisdom, L.L.P. be permitted to withdraw from the representation and that Mr. Alexander, Ms. Beeson, and Ms. Sorenson of Beck Redden LLP be substituted as counsel of record for all purposes.

4. Garth and Clayton request that following the withdrawal and substitution sought herein, that copies of all pleadings, discovery, notices, correspondence, motions, orders, and all other documents relating to this action be served upon Mr. Alexander, Ms. Beeson, and Ms. Sorenson as follows:

Fields Alexander  
falexander@beckredden.com  
Amy Parker Beeson  
abeeson@beckredden.com  
Kaitie Sorenson  
ksorenson@beckredden.com  
BECK REDDEN LLP  
1221 McKinney Street, Suite 4500  
Houston, Texas 77010-2010  
Telephone: (713) 951-3700  
Facsimile: (713) 951-3720

5. The requested withdrawal and substitution are being sought for good cause, not for purposes of delay, and will not impact the progress of this case.

#### **PRAYER**

For the reasons set forth herein, Defendants Tyrrell L. Garth and Phillip H. Clayton respectfully request that the Court enter the proposed order submitted concurrently herewith granting this Unopposed Motion for Withdrawal and Substitution of Counsel permitting Fields Alexander, Amy Parker Beeson, and Kaitie Sorenson of Beck Redden LLP to be substituted as

counsel of record for Tyrrell L. Garth and Phillip H. Clayton in place of W. Jackson Wisdom and James M. Cleary, Jr. of Martin, Disiere, Jefferson & Wisdom, L.L.P. and permitting Mr. Wisdom and Mr. Cleary to withdraw.

Dated: September 26, 2024

Respectfully submitted,

**BECK REDDEN LLP**

By: /s/ Fields Alexander

Fields Alexander – Attorney in Charge  
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Amy Parker Beeson – of Counsel  
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ATTORNEYS FOR DEFENDANTS  
TYRRELL L. GARTH AND PHILLIP H.  
CLAYTON

**CERTIFICATE OF SERVICE**

I hereby certify that on September 26, 2024, I served the foregoing notice via the CM/ECF system, which will provide notice to all parties of record.

By: /s/ Amy Parker Beeson

Amy Parker Beeson

**CERTIFICATE OF CONFERENCE**

I hereby certify that on September 25, 2024, I conferred with all counsel of record, and confirmed that they are unopposed to the relief sought herein.

By: /s/ Amy Parker Beeson  
Amy Parker Beeson